

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUÑIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, JOHN DOE, and THOMAS  
BAKER,**

**Plaintiffs,**

**v.**

**JASON KESSLER, et al.,**

**Defendants.**

**Civil Action No. 3:17-cv-00072-NKM**

**PLAINTIFFS' MOTION TO SEAL**

On July 15, 2021, the Court ordered the parties to “exchange and file exhibit lists on or before September 14, 2021.” (ECF No. 991). On September 14, 2021, Plaintiffs filed Plaintiffs’ Trial Exhibit List pursuant to the Court’s Order. (ECF No. 1071). Plaintiffs’ exhibit list inadvertently included some information designated as “Confidential” and “Highly Confidential” under the Order for the Production of Documents and Exchange of Confidential Information (“Protective Order”). (ECF No. 167). Plaintiffs will file on September 15, 2021, a version of their exhibit list with no “Confidential” or “Highly Confidential” information. Accordingly, pursuant to the Protective Order, Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing docket entry 1071.

Dated: September 15, 2021

Respectfully submitted,

/s/ Jessica Phillips

Jessica Phillips (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006

Of Counsel:

Roberta A. Kaplan (*pro hac vice*)  
Julie E. Fink (*pro hac vice*)  
Gabrielle E. Tenzer (*pro hac vice*)  
Michael L. Bloch (*pro hac vice*)  
Yotam Barkai (*pro hac vice*)  
Emily C. Cole (*pro hac vice*)  
Alexandra K. Conlon (*pro hac vice*)  
Jonathan R. Kay (*pro hac vice*)  
Benjamin D. White (*pro hac vice*)  
KAPLAN HECKER & FINK LLP  
350 Fifth Avenue, Suite 7110  
New York, NY 10118  
Telephone: (212) 763-0883  
rkaplan@kaplanhecker.com  
jfink@kaplanhecker.com  
gtenzer@kaplanhecker.com  
mbloch@kaplanhecker.com  
ybarkai@kaplanhecker.com  
ecole@kaplanhecker.com  
aconlon@kaplanhecker.com  
jkay@kaplanhecker.com  
bwhite@kaplanhecker.com

Robert T. Cahill (VSB 38562)  
COOLEY LLP  
11951 Freedom Drive, 14th Floor  
Reston, VA 20190-5656  
Telephone: (703) 456-8000  
Fax: (703) 456-8100  
rcahil@cooley.com

Jessica Phillips (*pro hac vice*)  
Karen L. Dunn (*pro hac vice*)  
William A. Isaacson (*pro hac vice*)  
Arpine S. Lawyer (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Fax: (202) 223-7420  
jphillips@paulweiss.com  
kdunn@paulweiss.com  
wisaacson@paulweiss.com  
alawyer@paulweiss.com

Makiko Hiromi (*pro hac vice*)  
Nicholas A. Butto (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3000  
Fax: (212) 757-3990  
mhiromi@paulweiss.com  
nbutto@paulweiss.com

Alan Levine (*pro hac vice*)  
Philip Bowman (*pro hac vice*)  
COOLEY LLP  
55 Hudson Yards  
New York, NY 10001  
Telephone: (212) 479-6260  
Fax: (212) 479-6275  
alevine@cooley.com

David E. Mills (*pro hac vice*)  
Joshua M. Siegel (VSB 73416)  
Caitlin B. Munley (*pro hac vice*)  
Samantha A. Strauss (*pro hac vice*)  
Alexandra Eber (*pro hac vice*)  
COOLEY LLP  
1299 Pennsylvania Avenue, NW  
Suite 700  
Washington, DC 20004  
Telephone: (202) 842-7800  
Fax: (202) 842-7899  
dmills@cooley.com  
jsiegel@cooley.com  
cmunley@cooley.com  
sastrauss@cooley.com  
aeber@cooley.com

pbowman@cooley.com  
J. Benjamin Rottenborn (VSB 84796)  
WOODS ROGERS PLC  
10 South Jefferson St., Suite 1400  
Roanoke, VA 24011  
Telephone: (540) 983-7600  
Fax: (540) 983-7711  
brottenborn@woodsrogers.com

*Counsel for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Elmer Woodard  
5661 US Hwy 29  
Blairs, VA 24527  
isuecrooks@comcast.net

James E. Kolenich  
Kolenich Law Office  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
jek318@gmail.com

*Counsel for Defendants Jason Kessler,  
Nathan Damigo, Identity Europa, Inc.  
(Identity Evropa), Matthew Parrott, and  
Traditionalist Worker Party*

William Edward ReBrook, IV  
The ReBrook Law Office  
6013 Clerkenwell Court  
Burke, VA 22015  
edward@rebrooklaw.com

*Counsel for Defendants Jeff Schoep, Matthew  
Heimbach, Matthew Parrott, Traditionalist  
Worker Party, National Socialist Movement,  
and Nationalist Front*

David L. Campbell  
Justin Saunders Gravatt  
Duane, Hauck, Davis & Gravatt, P.C.  
100 West Franklin Street, Suite 100  
Richmond, VA 23220  
dcampbell@dhdglaw.com  
jgravatt@dhdglaw.com

*Counsel for Defendant James A. Fields, Jr*

Bryan Jones  
106 W. South St., Suite 211  
Charlottesville, VA 22902  
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill,  
Michael Tubbs, and League of the South*

Joshua Smith  
Smith LLC  
807 Crane Avenue  
Pittsburgh, Pennsylvania 15216  
joshsmith2020@gmail.com

*Counsel for Defendants Matthew Parrott,  
Matthew Heimbach, and Traditionalist  
Worker Party*

I hereby certify that on September 15, 2021, I also served the following non-ECF participants via mail or electronic mail:

Richard Spencer  
richardbspencer@icloud.com  
richardbspencer@gmail.com

Vanguard America  
c/o Dillon Hopper  
dillon\_hopper@protonmail.com

Elliott Kline a/k/a Eli Mosley  
eli.f.mosley@gmail.com  
deplorabletruth@gmail.com  
eli.r.kline@gmail.com

Christopher Cantwell  
Christopher Cantwell 00991-509  
USP Marion, 4500 Prison Rd.  
P.O. Box 2000  
Marion, IL 62959

Robert "Azzmador" Ray  
azzmador@gmail.com

Dated: September 15, 2021

/s/ Jessica Phillips  
Jessica Phillips (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

*Counsel for Plaintiffs*